

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
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<b>OTTERBOURG PC</b> Melanie L. Cyganowski, Esq. Adam C. Silverstein, Esq. <a href="mailto:mcyganowski@otterbourg.com">mcyganowski@otterbourg.com</a> <a href="mailto:asilverstein@otterbourg.com">asilverstein@otterbourg.com</a> 230 Park Avenue New York, NY 10169 Tel: (212) 661-9100 Fax: (212) 682-6104 <i>Proposed Co-Counsel for the Official Committee of Talc Claimants</i>	<b>MASSEY &amp; GAIL LLP</b> Jonathan S. Massey, Esq. Rachel S. Morse, Esq. <a href="mailto:jmassey@masseygail.com">jmassey@masseygail.com</a> <a href="mailto:rmorse@masseygail.com">rmorse@masseygail.com</a> 1000 Maine Ave. SW, Suite 450 Washington, DC 20024 Tel: (202) 652-4511 Fax: (312) 379-0467 <i>Proposed Co-Counsel for the Official Committee of Talc Claimants</i>

In re:  
LTL MANAGEMENT LLC,<sup>1</sup>  
  
Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Honorable Michael B. Kaplan

**VERIFIED STATEMENT OF THE OFFICIAL COMMITTEE OF TALC CLAIMANTS  
IN SUPPORT ITS APPLICATION FOR RETENTION OF PROFESSIONAL,  
OTTERBOURG P.C., EFFECTIVE AS OF APRIL 14, 2023**

The signatories below, being of full age, on behalf of the Official Committee of Talc Claimants for LTL Management LLC (the “Committee”), certify as follows:

1. This Verified Statement is provided pursuant to Section D.2 of the *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases Effective as of November 1, 2013* (the “U.S. Trustee Guidelines”), promulgated by the U.S. Trustee. We are informed by Otterbourg P.C. (“Otterbourg”), proposed co-counsel, that the U.S. Trustee Guidelines require that any application for employment of an attorney under section 327 or 1103 of the Bankruptcy Code be accompanied by a verified statement from the client.
2. After its formation, the Committee determined it was in the talc claimants’ best interest to retain multiple law firms in connection with this case. On April 14, 2023, the Committee selected Otterbourg as its co-counsel after interviewing various candidates. As further set forth in the Committee’s application to retain Otterbourg (“Application”) [Dkt. No. 401], Otterbourg was selected because, among other reasons, it has vast experience and knowledge in complex bankruptcies and it has represented committees in other mass tort bankruptcy cases, including, in particular, LTL Management LLC’s (“LTL”) first bankruptcy case (“LTL I”). Otterbourg was actively involved in and had first-hand experience as co-counsel to the official committee of talc claimants appointed in LTL I.
3. Otterbourg has represented to the Committee, as reflected in its Application and accompanying certifications, that the billing rates and material terms for the engagement are comparable to the firm’s billing rates and terms for other non-bankruptcy engagements and to the billing rates and terms of other comparably skilled professionals.

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<sup>1</sup> The last four digits of the Debtor’s taxpayer identification number are 6622. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

4. As was done in LTL I, Committee counsel will collect all monthly fee statements and interim fee applications prepared by the Committee professionals and circulate for review and comment to the Committee. This process permits the Committee an opportunity to review and approve the fees and expenses. Similarly, the updated budget and staffing plans will be provided to the Committee on a quarterly basis for review and approval by the Committee. We believe this process is similar to the process employed in non-bankruptcy cases to supervise outside counsel.
5. In addition, as described in the Application and accompanying certifications, the Committee professionals have developed a protocol to avoid duplication of effort among the Committee professionals and to ensure the most efficient case management and delegation of task responsibilities.
6. Based on the foregoing, the Committee is of the opinion that it is necessary for the Committee to employ Otterbourg as co-counsel in this case (LTL's second bankruptcy) and that, based on the identity of issues and parties between LTL I and this case, such employment is in the best interest of the Committee and this bankruptcy estate.

Dated: June 4, 2023

Respectfully Submitted,

**THE OFFICIAL COMMITTEE OF TALC CLAIMANTS**

/s/ Michelle Parfitt

Michelle Parfitt, Esq., as specifically authorized  
by Committee co-chair Rebecca Love  
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/s/ Leigh O'Dell

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/s/ Lisa Nathanson Busch

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